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(702) 388-6336

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:14-CR-0395-KJD-PAL
)	
)	
Plaintiff,)	
)	
vs.)	
)	
DANIEL COLEMAN,)	
)	
Defendant.)	
)	

STIPULATION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Rebecca A. Levy, Assistant Federal Public Defender, counsel for Defendant DANIEL COLEMAN, that the date for the Government to file a response to the Defendant's Motion to Suppress Evidence Due to Fourth Amendment Violation (Docket #28) be extended for two (2) weeks.

This stipulation is entered for the following reasons:

1. Subsequent to the filing of the Defendant's Motion, the parties commenced discussions of how to possibly resolve the case with a guilty plea. The Government has tendered to the Defendant a proposed resolution to the charge against him. The proposed negotiation would contemplate the Defendant withdrawing his Motion, which will obviate the need for the Government to file a Response.

1 2. Counsel for the Defendant needs additional time to discuss the proposed plea
2 agreement with the Defendant.

3 3. The Defendant is incarcerated, but he does not object to the continuance of the
4 Government's response deadline.

5 4. The additional time requested herein is not sought for purposes of delay, but
6 merely to allow the parties sufficient opportunity to resolve this case.

7 5. Additionally, denial of this request for continuance could result in a miscarriage
8 of justice.

9 6. This is the first stipulation filed herein to continue the Government's response
10 deadline.

11 DATED: February 24, 2015.

12
13 _____
14 /s/
15 PHILLIP N. SMITH, JR.
16 Assistant United States Attorney
17 Counsel for the United States

12
13 _____
14 /s/
15 REBECCA A. LEVY
16 Assistant Federal Public Defender
17 Counsel for Defendant DANIEL COLEMAN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:14-CR-00395-KJD-PAL
)	
)	
Plaintiff,)	
)	
vs.)	
)	
DANIEL COLEMAN,)	
)	
Defendant.)	
_____)	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Subsequent to the filing of the Defendant's Motion, the parties commenced discussions of how to possibly resolve the case with a guilty plea. The Government has tendered to the Defendant a proposed resolution to the charge against him. The proposed negotiation would contemplate the Defendant withdrawing his Motion, which will obviate the need for the Government to file a Response.

2. Counsel for the Defendant needs additional time to discuss the proposed plea agreement with the Defendant.

3. The Defendant is incarcerated, but he does not object to the continuance of the Government's response deadline.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow the parties sufficient opportunity to resolve this case.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

